

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHEILA PAULOS,	:
	:
Plaintiff,	:
	:
vs.	:
	: NO.
NORDSTROM RACK,	:
	:
And	:
	:
NORDSTROM RACK CHESTNUT STREET,	:
	:
And	:
	:
NORDSTROM, INC.	:
	:
Defendants.	:

NOTICE OF REMOVAL

**TO THE HONORABLE JUDGES OF THE SAID
DISTRICT COURT OF THE UNITED STATES:**

PLEASE TAKE NOTICE that Defendant Nordstrom, Inc.¹ (“Nordstrom”), by and through its attorneys, Littleton Park Joyce Ughetta & Kelly LLP, hereby petitions the United States District Court for the Eastern District of Pennsylvania for removal of this case pursuant to 28 U.S.C. §§ 1441 and 1446 and states the following:

1. This case is presently pending in the Pennsylvania Court of Common Pleas of Philadelphia County under Case No. 191002584. Pursuant to 28 U.S.C. Section 112, Philadelphia

¹ Nordstrom, Inc. is the only proper defendant in this matter. Nordstrom Rack is a wholly-owned subsidiary of Nordstrom, Inc. and is without assets or employees. Nordstrom Rack Chestnut Street is not a legal entity and is simply a Nordstrom Rack location. Nordstrom, Inc. is seeking a stipulation of dismissal as to these two named defendants.

County is within the territory assigned to the United States District Court for the Eastern District of Pennsylvania.

2. Plaintiff filed her Complaint on October 22, 2019. *See* Exhibit A.

3. Plaintiff served Nordstrom on October 25, 2019.

4. The Complaint asserts a claim of negligence. *Id.*

5. The Complaint seeks damages in excess of \$75,000, including, *inter alia*, damages for injuries suffered such as a fracture requiring surgery, indefinite severe shock to Plaintiff's nervous system, indefinite mental anguish, past and future costs for medication, wage loss, permanent disability and a permanent impairment of earning capacity. *Id.*

6. Plaintiff is a resident of Pennsylvania, residing at 644 Pine Street, Philadelphia, Pennsylvania. *Id.* at ¶ 1.

7. Nordstrom is a publicly traded Washington corporation with a principal place of business located at 1600 7th Avenue, Seattle, Washington.

8. Since Plaintiff and Defendant are citizens of different states and the amount in controversy is in excess of \$75,000, this Court has original diversity jurisdiction over this case pursuant to 28 U.S.C. § 1332.

9. This petition for removal is timely filed within the 30-day period specified by 28 U.S.C. 1446(b).

10. Furthermore, this petition for removal is being made within one year of the commencement of this action.

WHEREFORE, Defendant Nordstrom, Inc. respectfully requests that this case be removed to this Honorable Court.

Respectfully submitted,

LITTLETON PARK

JOYCE UGHETTA & KELLY LLP

By: 

Kristen E. Dennison, Esquire
Robert E. Lavoie, Esquire

*Attorneys for Defendant,
Nordstrom, Inc.*

Dated: November 25, 2019

CERTIFICATE OF SERVICE

I, Kristen E. Dennison, Esquire, hereby certify that I caused a true and correct copy of the foregoing Notice of Removal to be served on all counsel of record via e-mail and regular mail.

Respectfully submitted,

LITTLETON PARK

JOYCE UGHETTA & KELLY LLP

By:

A handwritten signature in blue ink, appearing to read "Kristen E. Dennison", written over a horizontal line.

Kristen E. Dennison, Esquire

*Attorneys for Defendant,
Nordstrom, Inc.,*

Dated: November 25, 2019